

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

KATIUSCA ALTAGRACIA-RAMIREZ,
Defendant.

CR. NO.: 25-001 (SCC)

DEFENDANT’S SENTENCING MEMORANDUM

Ms. Altagracia-Ramirez (“Katusca”) was raised in the town of Haina, Santo Domingo, Dominican Republic. There, she lived with her mother in a tiny wooden house with a palm leaf roof composed of 3 (three) bedrooms. There was no bathroom in the home, instead they bathed in the backyard or at the beach. Whenever a hurricane or storm would pass through, they would normally lose most of their clothing and furniture inside of the home. Often, they would have to evacuate to a refuge in Santo Domingo only to start all over again.

Katusca was raised without a father. Her biological father, Giovannie Betancourt-Melo abandoned the family when Katusca was only 7 (seven) months old. Katusca was born premature at twenty-eight (28) weeks old. She suffered being raised by a single mother who received no type of support from Giovannie.

Katusca dropped out of school in the sixth grade and became pregnant for the first time at 13 (thirteen). Katusca hid her relationship with Manuel, their children’s father, because he was much older than her and she also knew how her mother would disapprove of such an arrangement. At just 13 years of age, Katusca had left school, became a mother and a wife, and was living with an adult man outside of her mother’s home.

Katusca reports that a diaper costs \$23-30 Pesos Dominicanos in the Dominican Republic. There is often no milk, no rice, no beans, nor eggs in the home. Sometimes they have fish, but chicken and pork are a luxury because a pound of chicken costs \$140 Pesos Dominicanos. The milk in the home needs to be saved for her youngest daughter at noon and night. Sometimes, Katusca can only feed her children with juice, milk and dry cookies. Katusca was living with her 3 (three) children in a rented room for the last year and half before she arrived in Puerto Rico.

During her childhood and young adult years, Katusca has encountered medical problems relating to obesity and being overweight. She has been taking medication to regulate her high blood pressure and on at least one occasion has been hospitalized because her blood pressure was out of control.

Katusca described herself as a nervous child and someone who cries easily when becoming anxious. Katusca often experienced bouts of depression as a child and these episodes became worse after she gave birth. Katusca described experiencing post-partum depression symptoms after she gave birth to her third daughter Kimberly, who is now 2 (two) years old.

The generational poverty has been put upon Katusca because of the social, economic and political issues existing in the Dominican Republic. The resulting desperation caused Katusca to make a decision that millions of Dominicans have attempted during history: to migrate to a territory of the United States. This risky proposition became a necessity for Katusca to have an opportunity to live free from servitude, starvation, mistreatment and hunger.

Katiusca was a woman willing to put her life at risk in exchange for the opportunity to provide for her children. She is a determined woman searching for employment opportunities as a laborer. Her mission was to feed her family and eventually construct a stable home of concrete that would not be destroyed in the next hurricane or storm.

The anger and resistance Katiusca demonstrated during the past several months is not because she is a bad person, nor a criminal. Rather, they are the manifestation of multiple traumatic experiences. After spending 3 (days) on the high seas, becoming dehydrated, eating poorly and being forced to inhale gasoline fumes, Katiusca's dreams were destroyed. Her fear, aggression, and hopelessness resulted in a mental health breakdown on the day of her arrest. It is easy to see how someone in Katiusca's position would become very impulsive and even more desperate while being detained in a foreign country.

Now, we are asking the Court to impose a sentence of time-served which will enable Katiusca to return to her home country as soon as possible. Undoubtedly, Katiusca will need to endure the process of being repatriated to the Dominican Republic. This will take additional time and cause further stress and anxiety. However, she can now see the light at the end of the tunnel. A sentence of time-served is not a freebie. The past several months of detention have been punishment enough. There is no further deterrence needed as Katiusca has learned her lesson for the last time.

WHEREFORE, it is respectfully requested that this Honorable Court take notice of this memorandum and sentence Ms. Altagracia-Ramirez to a period of time-served.

I HEREBY CERTIFY that on this date I electronically filed the present *Sentencing Memorandum* with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 31st day of March 2025

RACHEL BRILL
Chief Defender
District of Puerto Rico

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